

WECHSLER & COHEN, LLP
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(212) 847-7900
Attorneys for Defendant Curtis E. Schroeder

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Edward R. Pressman Film Corporation,	:	
	:	
Plaintiff,	:	07 Civ 9411 (GEL)
	:	
- against -	:	
	:	<u>ANSWER</u>
Curtis E. Schroeder,	:	
	:	
Defendant.	:	
-----	X	

Defendant, Curtis E. Schroeder (“Defendant”) by and through its attorneys, Wechsler & Cohen, LLP, answers the Complaint as follows:

1. Denies the allegations in paragraph 1.
2. Denies the allegations in paragraph 2.
3. Denies the allegations in paragraph 3 except denies knowledge and information sufficient to form a belief as to the truth of allegations concerning propriety of jurisdiction pursuant to 28 U.S.C. § 1332(a).
4. Denies the allegations in paragraph 4.
5. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in paragraph 5.
6. Denies the allegations in paragraph 6 except admits that Defendant resides at 437 Via LaSelva, Redondo Beach, California 90277.

7. Denies the allegations in paragraph 7 except states that Defendant was Chief Financial Officer of plaintiff during the period February 14, 1991 to February 14, 1997.

8. Denies the allegations in paragraph 8.

9. Denies the allegations in paragraph 9.

10. Denies the allegations in paragraph 10 except states that Defendant made certain payments to plaintiff.

11. Denies the allegations in paragraph 11.

12. Denies the allegations in paragraph 12 except states that Defendant has not made any payments to plaintiff since December 2002.

13. Denies the allegations in paragraph 13.

14. Answering paragraph 14 of the Complaint, Defendant repeats and realleges his responses to paragraphs 1 – 13 as though fully set forth herein.

15. Denies the allegations in paragraph 15.

16. Denies the allegations in paragraph 16.

17. Denies the allegations in paragraph 17.

18. Denies the allegations in paragraph 18.

FIRST DEFENSE

19. This Court lacks jurisdiction over Defendant because service of process was insufficient.

SECOND DEFENSE

20. This Court lacks personal jurisdiction over Defendant.

THIRD DEFENSE

21. Venue is improper.

FOURTH DEFENSE

22. The causes of action alleged in the Complaint are time barred.

FIFTH DEFENSE

23. The causes of action alleged in the Complaint are barred by the Statute of Frauds.

DEFENDANT DEMANDS TRIAL BY JURY.

WHEREFORE, Defendant demands judgment dismissing the Complaint together with costs and such other and further relief as the Court may deem just and proper.

Dated: New York, New York
December 4, 2007

WECHSLER & COHEN LLP

By: */s/ James F. X. Hiler*
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